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UBER TECHNOLOGIES, INC.
14 and OTTOMOTTO LLC

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA
17 SAN FRANCISCO DIVISION

18 WAYMO LLC,
19 Plaintiff,
20 v.
21 UBER TECHNOLOGIES, INC.,
22 OTTOMOTTO LLC; OTTO TRUCKING LLC,
23 Defendants.

Case No. 3:17-cv-00939-WHA

**DEFENDANTS UBER
TECHNOLOGIES, INC.'S AND
OTTOMOTTO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL EXHIBITS TO THEIR
MOTION TO COMPEL RESPONSES
TO DOCUMENT REQUESTS AND
INTERROGATORIES, ENFORCE THE
COURT ORDER'S ON SEACH TERMS,
AND COMPEL 30(b)(6) TESTIMONY**

Judge: Hon. Jacqueline Scott Corley
Trial Date: October 10, 2017

Pursuant to N.D. Cal. Civil Local Rules 7-11 and 79-5, Defendants Uber Technologies, Inc. and Ottomotto LLC (collectively, “Uber”) submit this administrative motion for an order to file under seal exhibits to Uber’s Motion to Compel Responses to Document Requests and Interrogatories, Enforce Court Order, and Compel Production of 30(b)(6) Witness on Uber Topic 7. Specifically, Uber requests an order granting leave to file under seal the confidential portions of the following:

Document	Portions to Be Filed Under Seal	Designating Party
Letter Brief to Compel Responses to Document Requests and Interrogatories, Enforce Court Order on Search Terms, and Compel Production of 30(b)(6) Witness	Highlighted Portions	Plaintiff
Exhibit 1 to the Pritt Declaration ISO Letter Brief to Compel Production of Documents (“Pritt Declaration”)	Entire Document	Plaintiff
Exhibit 2 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 3 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 4 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 5 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 6 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 7 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 8 to the Pritt Declaration	Highlighted Portions	Plaintiff
Exhibit 9 to the Pritt Declaration	Entire Document	Plaintiff
Exhibit 10 to the Pritt Declaration	Entire Document	Plaintiff

The highlighted portions of the Letter Brief and Exhibit 8; and the entirety of Exhibits 1, 2, 3, 4, 5, 6, 7, 9 and 10, contain information that Waymo designated or considers “Highly Confidential – Attorneys’ Eyes Only” pursuant to the Protective Order in this case, or that

Waymo asked Uber to file under seal. (*See* Pritt Decl. ISO Uber's Administrative Motion to File Documents Under Seal, ¶ 3.)

Pursuant to Civil Local Rule 79-5(d)(2), Uber will lodge with the Clerk the documents at issue, with accompanying chamber copies. Uber served Waymo with this motion on August 3, 2017.

Dated: August 15, 2017

BOIES SCHILLER FLEXNER LLP

By: /s/ Karen L. Dunn

Karen L. Dunn

Counsel for Defendants
UBER TECHNOLOGIES, INC. AND
OTTOMOTTO LLC